

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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AMERICAN ECONOMY INSURANCE  
COMPANY,

Plaintiff,

vs.

CIVIL ACTION NO. 2:16-CV-2494

SKOUTERIS WALK, PLLC; WILLIAM  
B. WALK, JR.; MICHAEL C. SKOUTERIS;  
MARCI LAVERDET; and DARLINE MAY,  
as the Attorney-in-Fact for and Next Friend of  
Scharlene Cain,

Defendants.

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MOTION OF DEFENDANT, MARCI LAVERDET, FOR LEAVE TO AMEND  
ANSWER

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Comes now the Defendant, Marci Laverdet ("Laverdet"), pursuant to the provisions of FRCP Rule 15(a), as well as pursuant to statement of her counsel at the Court's September 8, 2016 status conference, and moves the Court for leave to amend her Answer (Doc. 13) so as to strike the following language set forth on pages 6-7, thereof:

"NOW, HAVING FULLY ANSWERED, Laverdet prays that the Court declare that American Economy has a duty to defend and indemnify Skouteris Walk, Walk and Skouteris with regard to the claims she has asserted in the Laverdet Suit, and further that she be awarded such further and additional relief to which she may be entitled in the premises."

Having fully examined the Policy issued to Skouteris and Magee, PLLC by the Plaintiff, American Economy (Doc. 1-7, pp. 1-150), Laverdet acknowledges that the claims she has asserted in the Laverdet Lawsuit are excluded pursuant to the terms of the Policy.

WHEREFORE, PREMISES CONSIDERED, Laverdet prays that the following language be inserted in said Answer in place of the foregoing deleted language:

**“NOW, HAVING FULLY ANSWERED, Laverdet prays that the Court declare the rights and obligations of the parties with regard to the American Economy Policy attached as Exhibit A to the Petition (Doc. 1-7; pp. 1-150 & Doc. 1/8, pp. 1-115), and further that she be awarded additional relief upon which she may be entitled in the premises.”**

THE WINCHESTER LAW FIRM, PLLC  
Attorneys for Marci Laverdet

/s/ John D. Horne  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent either electronically, or via U.S. Mail, postage prepaid to:

Jason M. Bergeron  
Attorney at Law  
The Pinnacle at Symphony Place  
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Darline May  
501 Robey St.  
Franklin, KY 42134

This the 15th day of September, 2016.

/s/ John D. Horne  
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Attorney